

**DIVISION OF ENVIRONMENTAL HEALTH
SOLID WASTE PROGRAM
610 UNIVERSITY AVENUE
FAIRBANKS, ALASKA 99709-3643**
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File Number: 860.15.001

May 13, 1999

CERTIFIED MAIL - RETURN RECEIPT REQUESTED #Z182 375 080

Major Kent H. Nonaka, Chief
Environmental Flight
611th CES/CEV, U.S. Air Force
6900 9th St., Ste. 360
Elmendorf Air Force Base, Alaska 99506-2270

**Re: Solid Waste Disposal Permit #9931-BA006, Renewal of Campion Asbestos Landfill Permit
#9831-BA014**

Dear Major Nonaka:

The Department of Environmental Conservation has completed its evaluation of your application dated April 5, 1999, for the renewal of the solid waste disposal permit for the disposal of construction/demolition waste, and asbestos at Campion Air Station, located in Section 20, T.9S., R.11E., Kateel River Meridian, and is issuing the enclosed permit in accordance with AS 46, 18 AAC 15, and 18 AAC 60. Please review the conditions and stipulations in the permit and ensure they are all understood. This permit is effective upon issuance and expires May 1, 2004.

Any person who disagrees with this decision may appeal the decision by requesting an adjudicatory hearing, using the procedures contained in 18 AAC 15.200-310. Hearing requests must be delivered to the Commissioner of the Department of Environmental Conservation, 410 Willoughby Avenue, Juneau, Alaska 99801-1728, within thirty (30) days of receipt of this letter. If a hearing is not requested within thirty (30) days, the right to appeal is waived. Please also, send a copy of the request to the undersigned.

The issuance of this permit does not release the applicant from the responsibility to adhere to other applicable permits, which may be required by other State and Federal Agencies.

Sincerely,

Kris McCumby for
Heather Stockard
Solid Waste Program Manager

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Enclosure: Permit 9331-BA006
cc: Mark Shoviak, 611 CES/CEV

**ALASKA DEPARTMENT
OF
ENVIRONMENTAL CONSERVATION**

SOLID WASTE DISPOSAL PERMIT

Permit 9931-BA006

Date: May 13, 1999

This Solid Waste Disposal Permit is issued to the Department of the Air Force, 611th Civil Engineering Squadron 6900 9th St., Ste. 360, Elmendorf Air Force Base, Alaska 99506-2270, for the operation and maintenance of a sanitary landfill for construction/demolition debris and asbestos at Campion Air Force Station, Section 20, T.9S., R.11E., Kateel River Meridian, Alaska. This permit is subject to the conditions and stipulations contained in Appendices A, B, and C, which are incorporated herein by reference.

This permit is issued under provisions of Alaska Statute 46.03, the Alaska Administrative Code, as amended or revised, and other applicable state laws and regulations.

This permit is effective upon issuance and expires May 1, 2004. It may be terminated or modified in accordance with AS 46.03.120.

Kris McCumby for
Heather Stockard
Solid Waste Program Manager

APPENDIX A - SPECIFIC CONDITIONS

I. SITE DEVELOPMENT

The permit holder shall:

- A. Comply with the designs and plans submitted with the application dated April 5, 1999, as well as the following permit conditions. Additional modification may be requested, but must be authorized by a permit amendment, before that modification is effective.
- B. Ensure that all operations will accommodate the waste volume and are done in a manner that will facilitate close-out when the landfill is closed.
- C. Ensure that asbestos disposal is done in accordance with Appendix C.
- D. Erect and maintain a readily visible sign at the site currently in use with the following information legibly printed:

Facility Operator
Owner/Operator
Conditions for Use
Emergency Phone Numbers

- E. Erect and maintain readily visible signs in the facility listing rules and prohibitions of use.
- F. Ensure that surface water runoff from outside the facility does not flow onto the facility and over, into or through uncovered or covered solid wastes by constructing and maintaining diversion structures such as ditches or berms.
- G. Ensure that drainage from the facility is controlled to prevent any water quality violations.
- H. Ensure that public access to the facility is controlled to reduce risks to health and to reduce safety hazards. This requires the placement and maintenance of a locked gate to the facility.
- I. Ensure wildlife and domestic animals are not allowed access to waste deposited at the facility and that the site be maintained to prevent being an attraction to them. Wastes will be stored in suitable containers prior to disposal to prevent wildlife attraction.
- J. Ensure that only construction/demolition waste and asbestos are disposed of at this site. Domestic refuse may not be disposed of at this site.

II. SITE OPERATION

The permit holder shall:

A. Burial

1. Consolidate and compact all light, easily windblown loose refuse and cover with a minimum of six (6) inches of compacted soil at the end of each operating day. Heavier wood or metal debris shall be covered monthly. Solid wastes should be compacted in two (2) foot increments before applying operational or final cover.
2. Institute an interim waste coverage plan if extreme winter weather prevents daily or monthly coverage of waste. The plan shall be approved by the Department prior to its implementation and may include the use of cover alternatives other than soil.
3. Ensure that solid wastes are not placed in surface waters and that a minimum separation of ten (10) feet is maintained between the high groundwater table and the lowest level of the waste.
4. Ensure that the maximum working face does not exceed thirty (30) feet in width. The maximum height of the working face shall not exceed eight feet.
5. Ensure that all nonsalvageable drums are empty of fluids prior to crushing and burying. All fluids removed from drums prior to the drums' disposal shall be properly disposed of in accordance with all applicable state and federal laws, including, but not limited to, RCRA, the Clean Water Act, the Clean Air Act, Title 46 of Alaska Statutes, and 18 AAC 60.
6. Ensure that all large containers e.g. drums are crushed and flattened to prevent voids in the fill.
7. Ensure that waste oils or oily wastes are managed in accordance with 40 CFR Part 279. Oil filters must be hot drained and crushed or incinerated prior to disposal.

B. Burning

1. Prohibit open burning on the working face and immediately extinguish any fires that occur on the working face.
2. Notify the Department of Environmental Conservation, Northern Regional Office, at 451-2108, if any fires occur on the working face.

II. SITE OPERATION (cont.)

C. Access

1. Construct and maintain onsite roads as necessary to assure adequate traffic control. Adequate traffic control means that the site supervisor will maintain positive control of all persons who are within the landfill boundaries and that refuse will be deposited in approved locations. Dumping in unauthorized areas violates conditions of this permit and Alaska Administrative Codes.

D. Litter

1. Collect and dispose of all windblown and littered refuse from the disposal site and along the entrance road once each week or at least as often as the site is monitored. All littered wastes on lands within five hundred (500) feet of the site, whether windblown or dumped, shall be collected and disposed of at a frequency necessary to prevent this litter from becoming an aesthetic nuisance.

E. Prohibitions and Special Restrictions

1. Prohibit the discharge of firearms at the facility.
2. Prohibit disposal of hazardous wastes, as defined in 40 CFR 261.3, oily wastes, waste oil, greases, paints, sludges, and chemical wastes at this facility.
3. Prohibit disposal of all salvageable or recyclable materials including, but not limited to, prefabricated buildings, vehicles, drums, tankage, tires, major equipment components, and major scrap components.
4. Prohibit the disposal of domestic or commercial refuse at this site.
5. Prohibit disposal of lead-acid batteries at the landfill site.

F. Monitoring and Reporting

1. Visually monitor the site for signs of damage or potential damage from settlement, ponding, leakage, erosion or operations at the site. Monitoring frequency shall be weekly when the site is used at least once a week. If the site use is less frequent, monitoring shall be done at least once each quarter. Retain the results of visual monitoring in the operating record for the facility for review during inspections.
2. Maintain a set of site development plans and submit an updated copy to the Department showing current status before the anniversary date of the permit each year.

F. Monitoring and Reporting (Cont.)

3. Photograph the disposal site:

- a. As prepared for waste disposal.
- b. During waste deposition at least once per year.
- c. After final cover has been applied.
- d. After revegetation during the summer following closure.

Photographs taken under sections a, b, and c of this permit should be submitted within sixty (60) days of closure and photographs under section d within one (1) year of closure.

III. CLOSURE AND RESTORATION

The permit holder shall:

- A. Ensure that a final cover be applied within ninety (90) days after the last waste is deposited, and consists of two to four (2 to 4) feet of material, the top six (6) inches of which will promote adequate water retention for the successful revegetation of the site.
- B. Develop and implement a vegetative cover plan for completed area within the first growing season using plant species recommended by the Alaska Plant Materials Center (907) 745-4469.
- C. Grade the completed landfill areas to promote surface water runoff without erosion, ponding, and minimize the amount of water entering solid wastes. Surface restoration and erosion control work, such as revegetation will be completed within six (6) weeks after moving to a new location. This restoration will be required again if the Department determines that significant erosion has occurred within five (5) years of facility closure.
- D. Delimit the location of the disposal and asbestos cells to a minimum of two permanent markers or survey monuments. Latitude and longitude values meeting third order survey accuracy shall be established on each monument and referenced on the survey as-built drawing.
- E. Prepare survey as-built or updated facility record drawings showing the location and volume of waste deposited at the landfill within sixty (60) days of the final closure.
- F. Record the survey as-built or updated facility record drawings at the State Recorder's Office (or other appropriate land records office approved by the Department) along with a plat note or other file notation informing future property owners that use of the land must not result in the disturbance of the integrity of the final cover, cap or other structures installed as part of the landfill closure, unless approved by the Department. Submit a copy of the survey as-built or record drawings and proof of the recordings to the ADEC Solid Waste Program, Fairbanks Office within sixty (60) days of final closure.

IV. POST-CLOSURE

The permit holder shall:

- A. Visually monitor the site annually, for at least five (5) years immediately following closure, to check for signs of damage from settlement or erosion.
- B. At the end of the post-closure period, submit a report to the nearest ADEC Solid Waste Program office describing site conditions and summarizing the information collected during post-closure monitoring.

APPENDIX B - GENERAL PERMIT CONDITIONS

I. ACCESS AND INSPECTION

The permittee shall allow the Commissioner or her/his representative access to the permitted facilities at reasonable times to conduct scheduled or unscheduled inspections or tests to determine compliance with this permit, State laws, and regulations.

II. INFORMATION ACCESS

Except for information relating to confidential processes or methods of manufacture, all records and reports submitted in accordance with the terms of this permit shall be available for public inspection at the State of Alaska Department of Environmental Conservation, Northern Regional Office, 610 University Avenue, Fairbanks, Alaska 99709-3643.

III. CIVIL AND CRIMINAL LIABILITY

Nothing in this permit shall relieve the permittee from civil or criminal penalties for noncompliance, whether or not such noncompliance is due to factors beyond his control, including, but not limited to, accidents, equipment breakdowns, or labor disputes.

IV. AVAILABILITY

The permittee shall post or maintain a copy of this permit available to the public at the disposal facility.

V. ADVERSE IMPACT

The permittee shall take all necessary means to minimize any adverse impacts to the receiving waters or lands resulting from noncompliance with any limitation specified in this permit, including any additional monitoring needed to determine the nature and impact of the noncomplying activity. The permittee shall cleanup and restore all areas adversely impacted by the noncompliance.

VI. CULTURAL OR PALEONTOLOGICAL RESOURCES

Should cultural or paleontological resources be discovered as a result of this activity, work which would disturb such resources is to be stopped, and the State Historic Preservation Office, Division of Parks and Outdoor Recreation, Department of Natural Resources, is to be notified immediately (907-762-2622).

VII. APPLICATIONS FOR RENEWAL

In accordance with 18 AAC 15.100(d), applications for renewal or amendment of this permit must be made no later than thirty (30) days before the expiration date of the permit or the planned effective date of the amendment.

VIII. OTHER LEGAL OBLIGATIONS

The requirements, duties, and obligations set forth in this permit are in addition to any requirements, duties, or obligations contained in any permit that the Alaska Department of Environmental Conservation or the U.S. Environmental Protection Agency has issued or may issue to the permittee. This permit does not relieve the permittee from the duty to obtain any and all necessary permits and to comply with the requirements contained in any such permit or with applicable state and federal laws and regulations. All activities conducted by the permittee pursuant to the terms of this permit and all plans implemented by the permittee pursuant to the terms of this permit shall comply with all applicable state and federal laws and regulations.

IX. POLLUTION PREVENTION

In order to prevent and minimize present and future pollution, when making management decisions that affect waste generation, the permittee shall consider the following order of priority options: waste source reduction; recycling of waste; waste treatment; and waste disposal.

APPENDIX C - ASBESTOS DISPOSAL CONDITIONS

I. SITE PREPARATION

- A. Designate a separate area for asbestos waste disposal.
- B. Install fencing, berms, trenches, or other barriers as necessary to control access to the designated asbestos disposal site.
- C. Post signs at the site entrance and at one hundred (100) foot intervals along the site boundary that state in one-inch (1") or taller lettering:

ASBESTOS WASTE DISPOSAL SITE
DO NOT CREATE DUST
BREATHING ASBESTOS
IS HAZARDOUS TO YOUR HEALTH

- D. Signs may be removed after the final cover has been applied, however, a permanent monument indicating that asbestos is buried below must be maintained.

II. RECEIVING ASBESTOS WASTE

- A. The permittee or designated representative must be present at the site to supervise the disposal. The landfill operator must maintain a log of the source and quantity of asbestos delivered. Landfill operators may require the driver to sign in or sign over a chain-of-custody or waste manifest form.
- B. Loads must be inspected to verify that friable asbestos waste is properly contained in leak-tight containers and labeled appropriately. The operator should contact the Alaska Department of Environmental Conservation and the U.S. Environmental Protection Agency if the waste is improperly packaged.
- C. Friable asbestos waste must be thoroughly wetted and placed in a leak-tight container before burial. Containers may be barrels, drums, or double four-mil (4 ml.) or thicker plastic bags.
- D. All friable asbestos containers shall have a warning label attached that states:

CAUTION
CONTAINS ASBESTOS
AVOID OPENING OR BREAKING CONTAINER
BREATHING ASBESTOS IS HAZARDOUS TO YOUR HEALTH

or:

CAUTION
CONTAINS ASBESTOS
AVOID OPENING OR BREAKING CONTAINER
BREATHING ASBESTOS DUST
MAY CAUSE SERIOUS BODILY HARM

II. RECEIVING ASBESTOS WASTE (cont.)

- E. Non-friable asbestos material must be buried in the designated asbestos disposal area in a manner that does not result in the release of asbestos dust. There are no regulations which require non-friable asbestos to be packaged or labeled, but in some cases, packaging may be appropriate to prevent the release of asbestos dust. The generation of asbestos dust from non-friable asbestos is a violation of NESHAP. The disposal of non-friable asbestos material into the normal waste stream has a high potential for generating asbestos dust and is not permitted.

III. WASTE DEPOSITION AND COVERING

- A. Asbestos waste must be placed into a trench carefully to avoid breaking the material or containers. Particular care must be taken with plastic bags since they may break under pressure and emit asbestos particles.
- B. Cover the waste and container with at least six (6) inches of non-asbestos material by the end of each day of waste deposition.
- C. Final cover of at least two (2) feet must be applied within ninety (90) days after the last deposition to areas that will not receive more waste within one (1) year. Additional cover may be required in areas subject to excessive soil erosion or frost action.
- D. The cover of a closed or abandoned asbestos waste disposal site shall maintain the integrity of the soil cover, slopes, vegetation, and drainage structures.

IV. REPORTING

- A. Provide an exact description of the location of asbestos deposition with reference to a permanent marker or survey post.
- B. Prepare and annually update as-built or record drawings showing the location and volume of waste deposited at the asbestos waste disposal site and file those drawings with the Department when the site is closed.
- C. Record a plat note or other file notation at the State Recorder's Office (or other appropriate land records office approved by the Department) notifying subsequent landowners of the location of asbestos waste on the property with a warning about health and safety hazards related to disturbing the site. Submit a copy of this notation and proof of recording to the ADEC Solid Waste Program, Fairbanks Office within sixty (60) days of final closure.